

# United States District Court

## EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

WILLIAM CLAYTON BROWN,

*Defendant.*

### CRIMINAL COMPLAINT

Case No. 20-MJ-148-KEW

I, Special Agent Joseph Dick, the undersigned complainant, state that the following is true to the best of my knowledge and belief.

On or about September 15, 2017, in the Eastern District of Oklahoma, defendant **WILLIAM CLAYTON BROWN** violated 18 Title, United States Code, Sections 1111(a), 1151, and 1153, an offense described as follows: **MURDER IN THE FIRST DEGREE IN INDIAN COUNTRY.**

I further state that I am a Special Agent with the Federal Bureau of Investigations, and that this complaint is based on the following facts:

(See attached Affidavit of Joseph Dick, which is attached hereto and made a part hereof by reference.)

Continued on the attached sheet.

  
Joseph Dick, Complainant  
Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence at: MUSKOGEE, OKLAHOMA

Date: September 22, 2020

KIMBERLY E. WEST  
UNITED STATES MAGISTRATE JUDGE  
Name and Title of Judicial Officer

  
Signature of Judicial Officer



**AFFIDAVIT FOR CRIMINAL COMPLAINT**

**AGENT BACKGROUND AND INTRODUCTION**

I, Joseph Dick, hereinafter referred to as "your affiant," being duly sworn, depose and state as follows:

1. Your affiant is a Special Agent with the Federal Bureau of Investigation (FBI), and has been so employed for two (2) years and eight (8) months. Your affiant is permanently assigned to the Violent Crime Squad of the Las Vegas Division of the FBI, but is temporarily assigned to the Oklahoma City Division, Muskogee Resident Agency. Your affiant is authorized and responsible for conducting investigations of numerous criminal violations that fall within the FBI's jurisdiction. Further, your affiant has investigated violent crimes to include bank robbery, Hobbs Act robbery, murder, murder for hire, kidnapping for ransom, fugitives from justice, and domestic terrorism. Prior to the FBI, your affiant was employed as a Police Officer in the state of Minnesota for fourteen (14) years.

2. The information in this Affidavit was obtained by your affiant through the assistance of other law enforcement agents and agencies, including their reports, and through other sources specifically named in this Affidavit.

3. Your affiant is authorized to conduct investigations of violent crimes in Indian Country in violation of Title 18, United States Code, Sections 1111(a), 1151, and 1153.

4. This Affidavit is intended to show that there is sufficient probable cause for a Complaint and does not set forth all of my knowledge about this matter.

5. This Affidavit is made in support of a Complaint and Arrest Warrant for the crime of Murder in the First Degree in Indian Country in violation of Title 18, United States Code, Sections 1111(a), 1151, and 1153. In support of this request, I submit the following:

**PROBABLE CAUSE**

6. On September 21, 2017, Damion Martin (“Martin”), was reported missing by his aunt Martina Martin (“Martina”) to the Eufaula, Oklahoma Police Department. Martina stated the last time she saw Martin was on September 15, 2017. Martina believed Martin had been staying with and was possibly romantically involved with Lacie Watson (“Watson”). Martina suspected Watson and Watson’s brother, WILLIAM CLAYTON BROWN (“BROWN”), may have been involved in Martin’s disappearance.

7. During the course of the investigation on September 27, 2017, law enforcement officers located a body in a field near 2221 Comanche Road, Eufaula, McIntosh County, Oklahoma. The body was inside a blue plastic tote with the words “Christmas Tree” handwritten on the side of the tote. The body inside the tote was in a moderate state of decomposition. The property the tote was located on was situated directly across the street from the residence of Michael Harris and Carol Brown, who were the step-father and mother of Watson and BROWN.

8. An autopsy of the body was performed by the Office of the Chief Medical Examiner, Eastern Division, Tulsa, Oklahoma on September 28, 2017. According to the Medical Examiner’s report, the body was identified as Damion Rashaud Martin by fingerprint comparison through the Oklahoma State Bureau of Investigation (OSBI). The report stated the cause of death was from multiple sharp force injuries, and the manner of death was ruled a homicide. The report documented injuries observed on Martin’s body and included one stab wound on the upper right shoulder area of the back, one stab wound to the head in the area behind the right ear, and a broken knife blade was lodged inside the skull behind the right ear.

**INTERVIEW OF LEONDA GIBSON**

9. Leonda Gibson (“Gibson”) was interviewed by law enforcement officers on September 27, 2017 at her residence located at 1929 Quail Drive, Eufaula, Oklahoma 74432. Gibson was allegedly the girlfriend of BROWN. Gibson consented for officers to search for BROWN at her property. While in the garage of the residence, officers observed a blue plastic tote, which appeared to be overflowing with an artificial Christmas tree and decorations. The officers observed the tote was similar in appearance to the tote that contained Martin’s body. Gibson told officers she had another blue tote with a Christmas tree inside, but the tote appeared to be missing. Officers showed a photograph of the tote that contained Martin’s body to Gibson. The photograph only depicted the side of the tote with the words “Christmas Tree” written on it. Gibson identified the writing on the tote in the photograph as her handwriting.

**INTERVIEW OF LACIE WATSON**

10. Lacie Watson (“Watson”) was interviewed post-Miranda with her court-appointed lawyer present on October 13, 2017, at the McIntosh County Sheriff’s Office by law enforcement investigators. Watson stated on September 15, 2017, she had been with Martin and BROWN earlier in the day. Watson eventually separated from Martin and BROWN, and drove to Leonda Gibson’s house. She entered the house, and no one was inside.

11. Watson went to the bathroom, and got into the bathtub. A short time later Martin and BROWN entered the bathroom singing. BROWN left the bathroom, and Martin handed Watson a towel as she got out of the bathtub. Watson wrapped the towel around herself, and Martin hugged her. As Martin hugged Watson, BROWN came back into the bathroom. Watson felt Martin hug her tighter, and she saw blood. Watson believed BROWN stabbed Martin several more times, and described the knife BROWN used to stab Martin with as having a white handle. Martin

collapsed and Watson fell with him as she screamed "No," and she asked BROWN why he did this. BROWN stated because Martin was going to kill her. Watson saw Martin had been stabbed in the brain and in the rib area. Watson was scared and thought BROWN was going to stab her and kill her. Watson stated BROWN stood there with a grin on his face.

12. BROWN grabbed Watson by the hair and told her not to tell anyone. BROWN moved Watson to the living room, and ordered her to sit in the corner. Watson observed BROWN going in and out of the house, and saw him carry a blue tote into the garage. Watson heard the garage door open. BROWN came inside and stated he "had his shit loaded" and he wanted to go to mom's house. Watson drove BROWN to their mom's house. BROWN unloaded the car while she stayed in the car. Watson drove BROWN to several more locations, and eventually dropped BROWN off at their mom's house and sped off.

#### **SEARCH WARRANT EXECUTED**

13. A search warrant was obtained for the residence of 1929 Quail Drive, Eufaula, Oklahoma, 74432 by Chief Investigator Robert Frost of District 25 District Attorney's Office of Oklahoma on October 13, 2017. Investigators from the District 25 District Attorney's Office of Oklahoma went to the residence and executed the search warrant. The front bathroom was photographed and searched. Investigators located what appeared to be blood on the bathtub, inside the drain, and on the wall behind the bathroom door. Law enforcement personnel removed the baseboard of the west wall in the bathroom. What appeared to be blood was located on the lower portion of the wall the baseboard had been attached to. The back of the baseboard, which had been against the wall, also had what appeared to be blood on it. Individual swabs were taken from the apparent blood from each location and collected as evidence. The swab evidence was later submitted to the OSBI Forensic Science Center for analysis.

**INTERVIEW OF WILLIAM CLAYTON BROWN**

14. BROWN was interviewed post-Miranda on October 14, 2017, at the Checotah Police Department by Investigators from the District 25 District Attorney's Office of Oklahoma.

15. BROWN stated on September 15, 2017, Martin said he was going to shoot BROWN's people, go in there and bite Watson on the "ass and shit" and "fucking rape her." BROWN claimed Martin was talking all kinds of "stupid shit" and Martin had a gun and went straight into the bathroom. BROWN heard Martin singing some crazy stuff and BROWN retrieved a knife. BROWN returned to the bathroom and Martin was bending over the bathtub doing something to Watson, like hugging her. BROWN stated he stabbed Martin twice in the back and once in the head. BROWN placed Martin down with his head toward the door. BROWN stated he was mad as hell but did not mean it. BROWN went in the bathroom and stabbed Martin because he was "fucking" with Watson. BROWN obtained the knife from a drawer in the kitchen.

16. BROWN stated he made Watson stay in the living room, and she thought he was going to kill her too. BROWN recalled he began cleaning, and Martin's clothes were bloody so he took them off and put them in the tub. BROWN put Martin's body in a blue tub and carried it to the garage. From the garage, BROWN took Martin to the car in the back seat.

17. BROWN stated he took all Martin's stuff and put it in a bag and buried it with him. BROWN took Martin's body to his mom's and dropped it off. BROWN stated Watson drove because he made her. BROWN first placed Martin's body in the shed behind the house, and put his clothes across the street in the woods in a basket.

18. BROWN was not sure how long it was before he moved Martin's body across the street to the wooded area. He said he moved it by himself and took a shovel to bury it, but he could not do him like that because he was his friend and he wanted his family to have him.

19. BROWN stated he was sorry all this happened.

**LABORATORY RESULTS OBTAINED FROM OSBI**

20. On March 22, 2018, The OSBI Forensic Science Center completed a report documenting the analysis performed on items recovered during the search warrant at 1929 Quail Drive, Eufaula, Oklahoma. The report contained the results for each individual item submitted. The analysis results for an item labeled “Swab #1 Bath Tub 18 ¾ East of West Wall – 8” above floor” where blood was detected, and the Deoxyribonucleic acid (DNA) profile matched the DNA profile of Martin. The analysis results for item labeled “Swab #7 – Top of Baseboard” where blood was detected, a partial DNA profile was obtained, and Martin could not be excluded as a potential contributor to the profile.

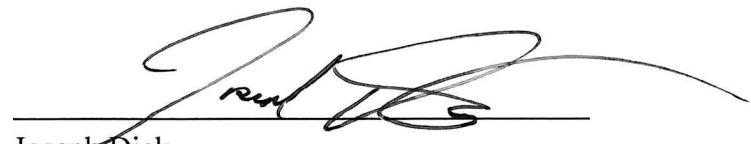
**CONCLUSION**

21. Pursuant to the United States Supreme Court Decision in *McGirt v. Oklahoma* on July 8, 2020, for the purposes of the Major Crimes Act, the historical reservation boundary of the Muscogee Creek Nation was restored. 1929 Quail Drive, Eufaula, McIntosh, Oklahoma, is within the historical boundary of the Muscogee Creek Nation and is Indian Land. Consequently, pursuant to Title 18, United States Code, Section 1151 the land is Indian Country. Affiant knows this land is within the Eastern District of Oklahoma.

22. Damion Rashaud Martin was a member of the Muscogee Creek Nation, Roll Number 56928. The Muscogee Creek Nation is a federally recognized Indian tribe.

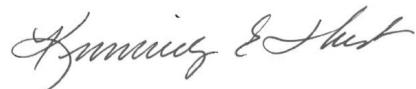
23. BROWN is an enrolled member of the Choctaw Nation of Oklahoma, a federal recognized Indian tribe located in the Eastern District of Oklahoma.

24. To the best of my knowledge and belief, all statements made in this Affidavit are true and correct and I believe probable cause exists for the issuance of arrest warrants for WILLIAM CLAYTON BROWN, for the crime of Murder in the First Degree in Indian Country, a violation of Title 18, United States Code, Sections 1111(a), 1151, and 1153.



Joseph Dick  
Special Agent  
Federal Bureau of Investigation

Sworn to and subscribed before me this 22 day of September, 2020.



KIMBERLY E. WEST  
United States Magistrate Judge